

PYLE, ROME, LICHTEN, EHRENBERG & LISS-RIORDAN, P.C.

Attorneys at Law
18 Tremont Street, Suite 500
Boston, MA 02108

Telephone (617) 367-7200
Fax (617) 367-4820

Tod A. Cochran
OF COUNSEL

Warren H. Pyle
David B. Rome
Harold L. Lichten*
Betsy Ehrenberg
Shannon Liss-Riordan**
Terence E. Coles
Katherine D. Shea

Nicole Horberg Decter**
Rebecca G. Pontikes
Alfred Gordon
Leah M. Barrault
Stephen Young

November 15, 2005

*Also admitted in Maine

**Also admitted in New York

VIA HAND DELIVERY

The Honorable William G. Young
Chief Judge, United States District Court
District of Massachusetts
One Courthouse Way
Boston, MA 02210

RE: Machado et al. v. Coverall North America, Inc., No. 05-11884

Dear Chief Judge Young:

Enclosed is a courtesy copy of Plaintiffs' Emergency Motion for a Preliminary Injunction Striking Defendant's Arbitration Policy as Unconscionable and Enjoining Defendant's Demands for Arbitration, or in the Alternative, Striking Portions of the Arbitration Policy and Consolidating Coverall's Eight Pending Arbitrations.

Because of the present uncertainty as to which judge this case should be assigned, I have filed it electronically with both Judge Tauro and Judge Wolf and am sending it to you as well in your capacity as Chief Judge. (Attached here are copies of the previous correspondence regarding the question of judge assignment.)

The plaintiffs request an expedited hearing on this motion, as they are seeking to enjoin, stay, or consolidate eight separate arbitration cases that Coverall has initiated against eight of the named plaintiffs. These AAA cases are proceeding rapidly and, as described in the motion, the plaintiffs are being billed for, and forced to defend against, all of these duplicative cases, which should not be allowed to proceed. Absent a court order, these arbitration cases will continue and the plaintiffs risk default. Plaintiffs are seeking to have their claims resolved together in one forum, and Coverall's actions in filing eight separate arbitration cases (as well as initially filing eight separate federal lawsuits) are clearly intended to attempt to overwhelm the plaintiffs with Coverall's greater resources.

PYLE, ROME, LICHTEN, EHRENBURG & LISS-RIORDAN, P.C.

Thank you for your attention to this matter.

Sincerely,


Shannon Liss-Riordan

cc: The Honorable Mark L. Wolf
The Honorable Joseph L. Tauro
Michael Vhay, Esq.